



917 SW Oak Street, Suite 300 Portland, Oregon 97205
T. 503.753.1310 F. 503.296.2973

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Chip Humphrey
U.S. EPA – Oregon Operations Office
805 SW Broadway, Suite 500
Portland, OR 97205

Kristine Koch
U.S. EPA – Region 10
1200 6th Ave., Suite 900
Seattle, WA. 98101

Sent via email

Dear Chip and Kristine:

We are writing on behalf the Nez Perce Tribe, the Confederated Tribes of the Grand Ronde Community of Oregon, the Confederated Tribes of Siletz Indians, the Confederated Tribes of the Umatilla Indian Reservation, and the Confederated Tribes of the Warm Springs Reservation of Oregon (the five Tribes). As you know, in addition to being Natural Resource Trustees at the Portland Harbor site, the five Tribes are also providing technical and legal support to EPA regarding the remedial investigation. In that regard, it has come to our attention that an issue has arisen in the Remedial Investigation Baseline Ecological Risk Assessment (BERA) regarding the relative importance of various species of fish, wildlife, and invertebrates within Portland Harbor and the BERA. The five Tribes offer this letter to ensure that the remedial action at Portland Harbor is protective of all species that make up the lower Willamette River ecosystem.

While the five Tribes place specific cultural importance on particular species at the site, such as salmon, lamprey and sturgeon, they have never lost sight of that fact that multiple other species are also important to a properly-functioning ecosystem. For example, benthic invertebrates serve as food sources for the fish species that the Tribes have relied on since time immemorial for their physical, spiritual and cultural well-being. Further, the five Tribes recognize that the BERA does not and cannot analyze risk to all species; many species in the BERA serve as surrogates for other species not specifically analyzed. In short, although some species play a more significant role in Tribal culture than others, the five Tribes urge you to recognize that all species analyzed in the BERA are important, as is the health of the ecosystem as a whole.

Sincerely,

Erin Madden
Nez Perce Tribal Representative

s/Brian Cunninghame
Warm Springs Tribal Representative

s/Tom Downey
Siletz Tribal Representative

s/Mike Karnosh
Grand Ronde Tribal Representative

s/Matt Johnson
Umatilla Tribal Representative